IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

MARRIOTT INTERNATIONAL, INC.,

Plaintiff,

v.

Civil Action No. 1:21-cv-00610-AJT/JFA

DYNASTY MARKETING GROUP LLC, et al.,

Defendants.

PLAINTIFF'S THIRD MOTION TO COMPEL DISCOVERY FROM DEFENDANT DYNASTY MARKETING GROUP LLC AND FOR SANCTIONS

Plaintiff Marriott International, Inc. ("Marriott"), by counsel and pursuant to Fed. R. Civ. P. 37 and the Local Rules of this Court, files this Third Motion to Compel: (1) full and complete answers to interrogatories and document requests propounded on Defendant Dynasty Marketing Group LLC ("DVC"); and (2) production of documents responsive to Marriott's discovery requests. Marriott also seeks sanctions for DVC's continued failure to comply with the Court's directions. The grounds for this Motion are more fully articulated in the Memorandum in Support of this Motion, filed contemporaneously herewith.

Dated: November 4, 2022 MARRIOTT INTERNATIONAL, INC. By counsel

/s/ Attison L. Barnes, III

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of November 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record and mailed first class, postage prepaid, to all remaining parties as follows:

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